

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

DOUGLAS HANDSHOE

PLAINTIFF

VS.

CIVIL ACTION NO. 1:15cv382HSO-JCG

VAUGHN PERRET, CHARLES LEARY &
DANIEL ABEL, D/B/A TROUT
POINT LODGE LTD OF NOVA SCOTIA
& IN THEIR INDIVIDUAL CAPACITIES
PROGRESS MEDIA GROUP LIMITED,
MARILYN SMULDERS, TORSTAR
CORPORATION, NATIONAL
GEOGRAPHIC SOCIETY, XYZ
FOUNDATION & JOHN DOES 1-50

DEFENDANTS

DEFENDANTS VAUGHN PERRET AND CHARLES LEARY RESPONSE IN OPPOSITION
TO PLAINTIFF'S MOTION FOR AN EXTENSION OF TIME [139]

COME NOW Defendants **Vaughn Perret** and **Charles Leary**, by and through their counsel, Purvis & Co. PLLC, and file this their Response in Opposition to Plaintiff's Motion for an Extension of Time [139], and would show that the Plaintiff's Motion is not well taken and should be denied for the reasons stated in their Response in Opposition to Motion to Issue Summons [132], their original Response in Opposition to Motion for an Extension of Time [133], their Memorandum filed in support of their Response in Opposition to Plaintiff's Motion to Issue Summons [134], and for the reasons discussed in their memorandum brief in support of this response, which is filed contemporaneously herewith.¹

Defendants Leary and Perret respectfully move this Court to deny Plaintiff's Motion for an Extension of Time, strike Plaintiff's Motion for Authorization of Substituted or Alternative Service

¹ See also Police Services Act, Chapter 349, attached hereto as Exhibit 1.

of Summons and Complaint [141] as moot, grant their Motion to Dismiss, and for such general relief as the Court deems appropriate in the premises.

RESPECTFULLY SUBMITTED, this the 16th day of June, 2017.

VAUGHN PERRET, DEFENDANT and
CHARLES LEARY, DEFENDANT

BY: PURVIS & CO. PLLC

BY: /s/ Jason B. Purvis
Jason B. Purvis, MSB # 100873

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that, on **June 16, 2017**, I caused a true and correct copy of the above and foregoing to be filed utilizing the Court's CM/ECF electronic document filing system, which caused notice of such filing to be delivered to all counsel of record and parties requesting notice, and by United States First Class Mail, postage prepaid, to the following non-ECF participants having appeared in this action:

[none]

/s/ Jason B. Purvis